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March 3, 2023

Via ECF

Hon. Matthew J. Skahill, U.S.M.J.
United States District Court, District of New Jersey
Mitchell H. Cohen Courthouse
4th and Cooper Streets
Camden, New Jersey 08101

Re: C.K. v. Rowan University, et al.
No.: 1:23-cv-00968

Dear Judge Skahill:

This firm represents Defendant Rowan University (“Rowan”) in the above-captioned matter. We are in receipt of Your Honor’s February 22, 2023 Order, setting an initial scheduling conference for March 15, 2023 at 10:30 a.m. (the “Order”). (Doc. 6.) Rowan respectfully requests that the initial scheduling conference be adjourned by at least 30 days. Co-Defendant Pi Kappa Alpha International Fraternity, Inc. (“PIKE International”) joins in Rowan’s request.

In the Order, counsel for all parties are directed to confer pursuant to Fed. R. Civ. P. 26(f) at least 21 days prior to the scheduling conference, and submit a joint discovery plan to Your Honor within 14 days after such meeting pursuant to L.Civ.R. 26.1(b)(2). Further, the Order provides that pursuant to Fed. R. Civ. P. 26(a)(1) and L. Civ. R. 26.1, the parties must make their initial disclosures within 14 days after the initial meeting of the parties.

The Order was entered on February 22, 2023, which was exactly 21 days prior to the March 15, 2023 scheduling conference. In other words, the deadline for counsel to confer was the day the Order was entered, and undersigned counsel was engaged in cross-country business travel on February 22-23, 2023. Further, the only party that Rowan could confer with at this point is PIKE International. Co-Defendants Oluwatomiwa Adewusi (“Adewusi”) and Pi Kappa Alpha Fraternity – Local Chapter Mu Alpha at Rowan University (“PIKE Chapter”) have not yet appeared in this action and Rowan does not know whether such parties have retained counsel. Additionally, at this time, the docket reflects that Plaintiff is proceeding *pro se*, as a Clerk’s Letter was issued on February 22, 2023, stating that Plaintiff’s counsel is not admitted to the Federal Bar of New Jersey. (Doc. 5.) The Clerk’s Letter directed Plaintiff to cure such deficiency by having a member of the

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Bar of this Court file an appearance, however, no such appearance has been entered yet. In other words, there also is no counsel on Plaintiff's side with whom we can confer at this point.

In light of the above, Rowan respectfully requests that the initial scheduling conference be adjourned by at least 30 days. Additionally, Rowan respectfully seeks clarification as to whether the initial conference, whenever it may be scheduled, will be held in-person or by teleconference.

Thank you for Your Honor's consideration of this matter. We are happy to discuss at the Court's convenience.

Respectfully submitted,

/s/ James A. Keller

James A. Keller

cc: All Counsel of Record (via ECF)